

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(ALEXANDRIA)**

IN RE:

ANTOINETTE JOSEPHINE PADMORE and  
WESLEY SPRINKLE

Debtors.

---

UDR NEWPORT VILLAGE LLC

Movant,

v.

ANTOINETTE JOSEPHINE PADMORE AND  
WESLEY SPRINKLE, DEBTORS,  
THOMAS P. GORMAN, TRUSTEE

Respondents.

Case No. 16-13446-BFK  
Chapter 13

**NOTICE OF MOTION TO OBTAIN RELIEF FROM  
AUTOMATIC STAY AS TO LEASED PREMISES AND HEARING THEREON**

NOTICE IS HEREBY GIVEN pursuant to Bankruptcy Rule 4001(d) that UDR Newport Village LLC ("Movant"), has filed a Motion to Modify the Automatic Stay under 11 U.S.C. §§ 362(d) or 362(b) (22) to permit the Movant to commence or continue an action in state court to recover the Premises from the Debtors, including obtaining a writ of possession and evicting the Debtors from the Premises. A copy of the Motion to Obtain Relief from Automatic Stay as to Lease Premises has been filed with the Bankruptcy Court. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

1

Mazin I. Elias, Esq. (Bar No. 72917)  
Offit | Kurman, P.C.  
4800 Montgomery Lane, 9<sup>th</sup> Floor  
Bethesda, Maryland 20814  
(240) 507-1708 (telephone) | (240) 507-1735 (facsimile)  
[MElias@OffitKurman.com](mailto:MElias@OffitKurman.com)  
*Counsel for Movant*

If you do not wish the Court to grant the relief sought in this motion, or if you want the Court to consider your views on the motion, then, within fourteen (14) days from the date of service of this notice, you must file a written response explaining your position with the Court at the following address: **Clerk of Court, United States Bankruptcy Court, 200 S. Washington Street, Alexandria, Virginia 22314-5405**, and serve a copy on the Movant's attorney at the address shown below. Unless a written response is filed and served within this fourteen (14) day period, the Court may deem opposition waived, treat the motion as conceded, and issue an order granting the requested relief.

If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive in on or before the expiration of the fifteen day period.

The hearing is scheduled for **November 16, 2016 at 9:30 am in Courtroom III** of the **United States Bankruptcy Court Eastern District of Virginia (Alexandria), 200 S. Washington Street, Alexandria, Virginia 22314-5405**.

If you or your lawyer do not take these steps by the deadline, the Court may decide that you do not oppose the relief sought in the Motion and may grant or otherwise dispose of the Motion before the scheduled hearing date.

Date: October 26, 2016

UDR NEWPORT VILLAGE LLC

/s/ Mazin I. Elias

Mazin I. Elias, Esq. (Bar Number: 72917)

OFFIT | KURMAN, P.C.

4800 Montgomery Lane, 9th Floor

Bethesda, MD 20814

(240) 507-1708 (telephone)

(240) 507-1735 (facsimile)

[melias@OffitKurman.com](mailto:melias@OffitKurman.com)

*Counsel for Movant*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 26, 2016 I served a copy of this Notice of Motion to Obtain Relief from Automatic Stay as to Leased Premises and Hearing via first class mail, postage pre-paid, upon each party required to receive notice under Local Bankruptcy Rule 4001(a)-1(E)(1) as follows:

Antoinette Josephine Padmore  
4753 West Braddock Rd, Apt 201  
Alexandria, VA 22311  
*Chapter 13 Debtor*

Wesley Sprinkle  
4753 West Braddock Rd, Apt 201  
Alexandria, VA 22311  
*Chapter 13 Joint Debtor*

Ashvin Pandurangi  
AP Law Group, PLC  
1518 Willow Lawn Dr.  
Suite 300  
Richmond, VA 23230  
*Counsel for Chapter 13 Debtors*

Thomas P. Gorman  
300 N. Washington St. Ste. 400  
Alexandria, VA 22314  
*Trustee*

/s/ Mazin I. Elias  
Mazin I. Elias, Esquire